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2 IN THE UNITED STATES DISTRICT COURT

3 FOR THE WESTERN DISTRICT OF OKLAHOMA

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6 ISABELA SNEED,

7 Plaintiff,

8 vs.

Case No. 22-cv-00031-R

9 INDEPENDENT SCHOOL DISTRICT

10 NO. 16 OF PAYNE COUNTY,

11 Defendant.

12 .

13 .

14 DEPOSITION OF

15 GLENN MARC MOORE,

16 taken on behalf of the Plaintiff, pursuant to

17 Notice to Take Deposition, beginning at 1:35 p.m.

18 on the 12th day of July, 2023, at the offices of

19 Appino & Biggs Reporting Service, 800 East 1st

20 Street, Suite 305, in the City of Wichita, County

21 of Sedgwick, and State of Kansas, before Cori R.

22 Power, CCR, CVR, Kansas License No. 1739, Missouri

23 License No. 1436.

24 .

25 .

PLAINTIFF'S
EXHIBIT

3

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1 A. My best recollection, yeah, would be that
2 would happen.

3 Q. I mean, the -- all I have, or at least
4 all that I've been produced so far on this was
5 that he -- that you had asked him to resign
6 effective on the 1st day of June, 2020.

7 A. No. I think that was me accepting his
8 resignation.

9 Q. Right.

10 A. Yeah.

11 Q. I -- I haven't seen any kind of
12 suspension paperwork. Was he suspended?

13 A. There was -- I don't -- I'd have to look
14 back at the emails, because it seemed like there
15 was some kind of conversation -- or there was only
16 like a few days left on his contract, so there was
17 something along the lines of, hey, I believe, but
18 I don't -- I mean, that's the best I can recall.
19 It would -- it would be in his personnel file.

20 Q. Okay. Let's see if -- let me show you
21 Exhibit 6.

22 A. Okay.

23 Q. Can you see that?

24 A. Yes, I see that.

25 Q. It says "Doctor Moore, this is my

1 resignation from employment by Stillwater Public
2 Schools effective June 1, 2020. I am waiving my
3 right to submit my resignation by certified mail
4 and understand that any remaining salary due me
5 for the 2019-2020 school year will be paid through
6 the district's normal district payroll process
7 because my employment responsibilities ended prior
8 to June 1."

9 A. Okay.

10 Q. And this is the documentation that I've,
11 at least, been provided with pertaining to his
12 resignation.

13 A. Okay.

14 Q. But I don't see any kind of documentation
15 -- and that's not to say that I couldn't have
16 missed it, but I certainly haven't, in my memory,
17 seen any documentation where he was ever put on
18 suspension. All I've been produced was
19 documentation showing me that he was allowed to
20 voluntarily resign his position, and he would be
21 paid for the rest of the school year.

22 A. Well, I know we -- and I'm trying to
23 remember three years ago. We were -- we were --
24 as soon as I found out from the police, we --
25 since it's essentially a charge, not conviction,

1 A. Either -- because it was -- there was
2 contact made with -- with Morejon because we -- I
3 remember we were going to come -- have him come in
4 and do -- conduct an interview, but I think that
5 was all done on email as far as communicating with
6 him. Maybe it was done on a phone or a telephone
7 call, but I don't think so.

8 So we were immediately bringing him in, and
9 there would also be -- I mean, I don't -- that
10 would be shocking if it wasn't a suspension,
11 because there -- because I know there was contact
12 with him, because any time you have that
13 allegation, that would be the process to start
14 investigating it. We were in the middle of our
15 investigation, and that's when he resigned.

16 Q. Okay. So -- and maybe on a break I can
17 look through some other documents and try to help
18 you with that.

19 A. Okay.

20 Q. So now tell me about what you remember
21 from the school's investigation after you learned
22 about the -- the allegation by Sneed that -- and
23 her mother was reporting them -- after you learned
24 about those allegations pertaining to Morejon,
25 what did the -- what -- basically your memory,

1 what did the school do next to start to
2 investigate this?

3 A. Because it was a -- an employee issue,
4 best I can recall, we were going to have -- start
5 our investigation with having him come in, and
6 then before that occurred, and he resigned, or
7 there was maybe a -- I just can't really recall
8 all the information, but I know there was contact,
9 him coming up, let's investigate, not --
10 assumption would be he would not be on campus, and
11 then before we got further into the investigation,
12 he resigned.

13 Q. And when you say "we," who was conducting
14 the investigation on behalf of the school?

15 A. I believe Doctor Shanahan and I. Doctor
16 Shanahan was the director of human resources.

17 Q. Okay.

18 A. And I think he helped.

19 Q. And you -- I mean your contract with the
20 school with the -- with the police department
21 required you guys to report the potential criminal
22 conduct. Did -- did you -- I'm assuming you
23 didn't have the need to report it because you were
24 told about it by the police; is that fair?

25 A. Correct, yeah.

1 A. -- with a crime at the time.

2 Q. Okay. I thought the resignation happened
3 after the charge.

4 A. The resignation did happen after the
5 charge; correct.

6 Q. I'm talking about the -- the weeks -- the
7 last couple weeks of school when you guys asked to
8 have a meeting with him.

9 A. No, it wasn't the last two weeks of
10 school.

11 Q. Well, was it the last week of school?

12 A. It was around that time frame.

13 Q. Okay. And it was based on someone from
14 the police department calling you guys and telling
15 you what was up; right?

16 A. Telling me that he was charged or going
17 to be charged, like that -- almost immediately or
18 within the next few -- that day or the next day.

19 Q. Okay. And then you asked for an
20 interview with him?

21 A. At that point when it -- when he was
22 charged, then we started conducting our own
23 investigation.

24 Q. Okay. And how long did that
25 investigation take place?

1 A. I -- my best recollection is we scheduled
2 a time for him to come in, but it was rescheduled,
3 and by that time he resigned.

4 Q. Okay. And so did you not do anything
5 else beyond just setting an interview with him?

6 A. That was our first step in the
7 investigation.

8 Q. Okay. And were there any other steps
9 taken beyond that?

10 A. Not that I recall.

11 Q. Okay. Was it not important for the
12 school to learn about what other faculty members
13 had -- had observed?

14 A. Our first step was to do an interview
15 with him.

16 Q. Right. But after -- after you decided
17 that you didn't need to do the interview because
18 he resigned, was it still not important to find
19 out, hey, what do the other faculty know about
20 this guy and the students?

21 A. Because the -- now that's -- their --
22 that investigation was to determine whether the
23 employment continued or not, and the employment
24 ended.

25 Q. Okay. So it wasn't -- it wasn't an

1 investigation into his sexual misconduct or
2 potential sexual misconduct with students at
3 Stillwater, it was purely into whether or not his
4 employment was going to continue?

5 A. It was an investigation into his -- his
6 actions, and then if something would have happened
7 there with more information, you could have
8 investigated it further.

9 Q. I -- I guess what I'm -- I'm trying to
10 understand is if you're going to investigate --
11 investigate him with respect to his actions with
12 students, okay, why you didn't talk to other
13 faculty members about their observations and
14 interactions that they observed with Morejon and
15 the students.

16 A. We didn't -- the investigation didn't get
17 to that point.

18 Q. And -- and why is that?

19 A. I believe because the investigation --
20 when we investigated with him it was because the
21 employment ended.

22 Q. Okay. And so you didn't feel like you
23 guys had the responsibility, if there were other
24 victims out there for example, that you would
25 conduct an investigation to find out who

1 addressed at that level and then not shared on up
2 the chain of command.

3 Q. Okay. And so -- would -- in that day
4 would it have not have been important for you,
5 when you start this investigation into Morejon, to
6 find out if any other administration or faculty
7 had received reports about it?

8 A. I have no information about that.

9 Q. That's not my -- that's not my question
10 though. Would it not have been important, through
11 an investigation, to find out if other faculty
12 members or other administration had received
13 reports about Morejon and inappropriate conduct
14 with students?

15 A. His actions prior to that?

16 Q. Yeah.

17 A. I'm not -- as far as regarding Morejon,
18 no. I mean, I -- I'm not sure I understand --
19 understand your question. Will you restate it?

20 Q. Sure. You were going -- it's my
21 understanding that you received word about Mr.
22 Morejon's inappropriate sexual actions with a
23 student through some unknown officer who you can't
24 remember now; correct?

25 A. I received notification that he was going

1 to be charged.

2 Q. Okay. For inappropriate sexual conduct
3 with a student; yes?

4 A. Correct.

5 Q. Okay. And you started an investigation
6 based off that information, a school
7 investigation; correct?

8 A. Correct.

9 Q. Okay. But as part of that investigation,
10 you never asked any of the faculty or any of the
11 other administration if anyone had received prior
12 complaints about Morejon's conduct; is that right?

13 A. There was a conversation with Ryan Blake,
14 the principal, but there was nothing along the
15 lines that you're talking about that came up in
16 that conversation that I can recall.

17 Q. Okay. Well, what came up in that
18 conversation?

19 A. I -- I don't really recall. I don't --
20 it was this happened. He was aware of it, but --
21 but nothing that I recall beyond that.

22 Q. Okay. But that -- I mean, Marc, with all
23 due respect, that gives me nothing. I mean, you
24 say you can't recall it, and that something
25 happened. I mean, what -- this is my chance to

1 talk to you while you're under oath.

2 A. Right. I mean, you have to understand.

3 We weren't even -- we were mostly off-campus at
4 that time. It was probably a phone call; it was
5 during COVID three years ago.

6 Q. Well, I know but --

7 A. I mean, it wasn't anything significant
8 that I remember other than this happened, you're
9 making sure you contact the principal. I don't --
10 I don't remember anything of that -- specific in
11 that conversation.

12 Q. Okay. Who is this principal you're
13 referring to?

14 A. Ryan Blake was the interim principal at
15 the junior high at that time.

16 Q. Okay. And you remember him having some
17 phone call with you that involved Morejon; is that
18 right?

19 A. There -- yeah, there was something in --
20 I knew that the topic was Morejon, but I don't
21 remember the conversation.

22 Q. And -- and he felt it important enough to
23 reach out to you directly; fair enough?

24 A. I don't remember if it was me contacting
25 him or him contacting me.

1 Q. Okay. And you dispute that you did that?

2 A. I -- yeah. I don't -- I have no
3 knowledge, and I don't have a -- I didn't have
4 personnel files.

5 Q. I'm not asking about personnel files.
6 He's saying that there were files that were
7 maintained in -- in the superintendent's office
8 that were out of the personnel files, that were
9 maintained separately from a personnel file, that
10 would main -- that would have documentation,
11 historical documentation that had been culled out,
12 not part of the personnel file, about an
13 employee's historical history with -- with the
14 school district.

15 A. Not that I'm aware of.

16 Q. He said that one of the secret files had
17 been leaked to the DA's office as it pertained to
18 Principal Fields's exodus from Stillwater Public
19 High School. You were the superintendent during
20 that time; right?

21 A. Correct.

22 Q. Was one of these secret files given to
23 the District Attorney's Office as it pertained to
24 Mr. Fields?

25 A. I'm -- I'm not aware of any secret files

1 Q. Okay. Who started the file?

2 A. Probably the documents that I had I
3 probably put into a -- a file on my computer.

4 Q. Okay. And so you were maintaining that
5 on the school's server or on your computer?

6 A. No. My -- everything on the computer was
7 backed up.

8 Q. Good. Where did you save the
9 investigation file that you had on Fields?

10 A. It would be on the school server.

11 Q. Okay. Where?

12 A. On my computer? I'm sorry. What --
13 answer the question again.

14 Q. Where was the investigation file saved?

15 A. It was saved in the district's archives
16 or district computer, district computer files,
17 because our -- our -- what's happening -- if it's
18 saved on your computer, it's saved on the district
19 files.

20 Q. But I'm asking you where the system
21 backed it up. I'll talk to an IT person about
22 that. I just want to know where you saved the
23 file, what you call the investigative file, in the
24 field?

25 A. I think it was on my computer.

1 Q. Okay. And when did you start maintaining
2 that file?

3 A. I conducted an investigation. The files
4 were in that investigation, and that's what I had.

5 Q. And when did you start maintaining an
6 investigation file is what I'm asking.

7 A. When -- when I received notification of
8 an incident to be investigated.

9 Q. Okay. How did you --

10 A. Which would have been in November.

11 Q. How did you receive information about an
12 incident that needed to be investigated?

13 A. I became aware of an incident at the
14 junior high in early November, and then that's --
15 about a possible incident, and then I investigated
16 it.

17 Q. Okay. And was it a possible criminal
18 incident?

19 A. The invest -- the investigation? Sorry.

20 Q. Sir, the -- the incident that you learned
21 about. Was it potentially criminal in nature?

22 A. Let me see. I'm trying to think. So,
23 like, the first part of the -- there was just an
24 investigation with a student. I didn't have a
25 suspicion that it was criminal in nature at the

1 beginning of the investigation.

2 Q. Let's let you walk me through how you --
3 with Mr. Fields, okay, because we're talking about
4 this allegation by a faculty member that
5 explicitly says you kept secret files in your
6 office, okay? Inclusive of secret electronic files
7 on your computer, okay, did you have any other
8 files on your computer that pertained to your
9 faculty members other than the file that you
10 maintained on Mr. Fields?

11 A. Well, I think, like, we did
12 investigations. I think like when Mr. Fields
13 began I did an investigation and created for that
14 -- materials from that investigation.

15 Q. Who taught you to -- whose idea was it?
16 And maybe it was yours, but -- but if not I want
17 to know whose idea was it that you were to create
18 a separate investigation file on your computer as
19 the superintendent when you decided or there was a
20 decision that was made to investigate a faculty
21 member?

22 A. Who -- who taught me that?

23 Q. Yeah. I mean, did you come up with that
24 on your own? Or did someone tell you, hey, it's
25 a practice here to maintain a file on your

1 him about the employment, and then he -- then he
2 resigned.

3 Q. I understand that, but you have clearly
4 indicated that you had started an investigation.
5 Multiple times you testified to that.

6 A. I don't know about "investigation." It
7 was more to have a conversation about him and his
8 employment.

9 Q. Okay. So you want to change your -- you
10 want to change your testimony, that you never
11 started an investigation of Mr. Morejon?

12 A. Well, I don't -- I don't know if the --
13 "investigation" was the right term. Maybe it was
14 conversation, but I know we were planning to meet
15 with Mr. Morejon.

16 Q. Okay. Is there a possibility that you
17 kept a file about Morejon on your computer, sir?

18 A. I don't recall a file with Mr. Morejon.

19 Q. I'm not asking if you recall it. I'm
20 asking if it's possible that you kept a file on
21 your computer pertaining to Mr. Morejon?

22 A. I -- I don't know if there is one or not.
23 I don't --

24 Q. Okay. You don't know. There could be,
25 but you don't know?

1 A. I don't know, huh-uh.

2 Q. Right. And if the suspension letter that
3 you referenced earlier in your deposition under
4 oath isn't in his personnel file, do you think it
5 possibly could be in that investigation file?

6 A. If -- if -- to the best of my
7 recollection, and maybe it's just because I've
8 gone through so many, personnel suspension is the
9 first thing, and if I'm remembering correct, if
10 you have a suspension letter, it would be in a
11 personnel file.

12 Q. Okay.

13 A. That's why it's confusing to me that --
14 maybe I'm not remembering correctly, but a
15 suspension letter, every suspension letter would
16 have been in a personnel file. So that's why I'm
17 -- I'm confused. If -- every case we had -- it
18 was personnel, that's like the first action, so
19 I'm not -- if it looked -- it's confusing that
20 it's not in the personnel file, or I'm not
21 remembering correctly.

22 Q. Okay.

23 A. That's what's -- it's a little bit
24 confusing to me. I mean, three years ago that was
25 just -- I don't know if that's just an assumption

1 that we did it every time, because there's always
2 a suspension letter, but if there's not one in the
3 file, I don't know what -- I don't -- that's what
4 I'm a little confused about right now. I don't
5 know if I'm just remembering incorrectly.

6 Q. When you would log on to your computer to
7 access your investigation files that pertain to
8 either students or employees, okay, did anyone
9 else access those files other than you?

10 A. Not that I'm aware of.

11 Q. Okay. So you had sole access to that
12 information; fair?

13 A. To the best of my knowledge.

14 Q. Okay. Walk me through how you would
15 access these electronic files. You come to your
16 office, you sit down in front of your computer,
17 and what do you do next?

18 A. I think you just go to file folders and
19 -- and have it organized and go -- go to it.

20 Q. And what were the folders subtitled?

21 A. I -- which -- which folder? I mean,
22 there wasn't a special --

23 Q. Well, I'd like you to walk me through
24 where you would access this information. Like did
25 you go -- was there a folder titled "Investigation

1 Files," and then you clicked on that, and when
2 that dropped down, there's a bunch of names or
3 initials?

4 A. I don't -- I don't know -- remember how I
5 organized them.

6 Q. Okay. But you were the one who organized
7 them; right?

8 A. They were on my computer, yes.

9 Q. Okay. And what did you do with those
10 when you left?

11 A. I'm not sure what they did with my files
12 when I left.

13 Q. Well, were they aware that you were
14 maintaining these files?

15 A. I -- not that I'm -- not -- no, I don't
16 know.

17 Q. Okay. Did you tell anyone that you were
18 maintaining the files?

19 A. Not that I can recall.

20 Q. Okay. Did you tell the District
21 Attorney's Office that you had maintained a file
22 on Mr. Fields?

23 A. They requested information, and I gave
24 them the information that I had. They needed --

25 Q. Did it include -- you include any

1 A. If you testify -- if you mandate, you
2 reporting it, if you thought there was sexual
3 abuse or neglect.

4 Q. And who would you have to report it to?

5 A. We would most often report it to the DHS.

6 Q. Well, it's not -- that's who -- look,
7 right here.

8 A. I can't see --

9 Q. Can you read it?

10 A. I can't see it.

11 MR. PRIDDY: Sorry, Dan. It's so small
12 we can't really see it.

13 MR. SMOLEN: We'll zoom in on it. One
14 minute.

15 BY MR. SMOLEN:

16 Q. Can you see it better now?

17 A. Yes.

18 Q. Can you read it now?

19 A. Yes. Most -- most definitely.

20 Q. Okay. I'm going to go down to subsection
21 B, okay? It says "Every person having reason to
22 believe that a child under the age of 18 years is
23 a victim of abuse or neglect shall report the
24 matter immediately to the Department of Human
25 Services. Reports shall be made to the hotline

1 provided for subsection A of this section. Any
2 allegation of abuse or neglect reported in any
3 manner through a county office shall be
4 immediately referred to the hotline by the
5 department."

6 Section 2, "Every school employee having
7 reason to believe that a student under the age of
8 18 years is a victim of abuse or neglect shall
9 report the matter immediately to the Department of
10 Human Services and local law enforcement. Reports
11 to the department shall be made to the hotline
12 provided for in subsection A of this Section."

13 Did you do that as it pertained to Ms. Sneed?

14 A. It was communicated -- I think we
15 received it from the law enforcement, so that's
16 why.

17 Q. Okay. Do you see where it says you're to
18 report it to DHS and local law enforcement?

19 A. Yes. I see that.

20 Q. Okay. And you were familiar with that
21 requirement; correct?

22 A. The reporting of abuse and neglect;
23 right.

24 Q. Right. To DHS? Yes?

25 A. Correct.

1 Q. And did you do that as it pertained to
2 Ms. Sneed?

3 A. I did not.

4 Q. Did anybody?

5 A. I'm not aware of others.

6 Q. For -- did anybody in the school
7 Stillwater school system report it to DHS?

8 A. I have no knowledge of others, whether
9 they reported it or not.

10 Q. If it was required, why didn't you report
11 it?

12 A. I think there was assumptions since the
13 -- where I was working with the law enforcement
14 that that was being -- that was being reported.

15 Q. Okay. Well, is there anywhere in the
16 statute that says you can assume it's being
17 reported by other people?

18 A. I'm not -- no, I don't see anything.

19 Q. Would you agree with me by not reporting
20 it to DHS you're in violation of the statute, at
21 least as it's written?

22 MR. PRIDDY: Object to the form.

23 A. So what was the -- I think there was an
24 assumption that the law enforcement were -- were
25 reporting it.

1 BY MR. SMOLEN:

2 Q. Okay. And I know that -- I know that's
3 what you're saying, okay?

4 A. Yeah. And that makes me compliant, as it
5 was reported to them.

6 Q. Well, nowhere in the statute allows you
7 to make an assumption that someone else has
8 reported it; agreed?

9 A. I don't know all of the -- I don't know
10 all of the statute.

11 Q. Do you need a minute to read it?

12 A. Well, no. It says "report." My
13 assumption was report it to law enforcement, and
14 that was being reported to DHS.

15 Q. But you -- you're a doctor; right?

16 A. Yes.

17 Q. You have a Ph.D.? Okay. Tell me what
18 the difference is between "and" and "or."

19 A. By reporting it to them, they were also
20 reporting it to DHS.

21 Q. Who told you they were reporting it to
22 DHS?

23 A. I think that was my thoughts.

24 Q. Okay. So those are just your thoughts.

25 No one told you that; fair?

1 A. It seemed like we had conversation, but I
2 can't recall all of it.

3 Q. Okay. You can't recall anything.

4 MR. PRIDDY: Object to the form.

5 BY MR. SMOLEN:

6 Q. I mean, that's my issue. I'm not trying
7 to get aggressive with you about it --

8 A. No, it's --

9 Q. -- but I don't remember anything.

10 A. We thought that was being reported.

11 Q. Who is "we"?

12 A. Or -- or me, sorry. Me.

13 Q. Okay. You felt like you didn't have an
14 obligation to report it to DHS because you assumed
15 somebody else was reporting it to DHS. That's why
16 you didn't report it.

17 A. Through law --

18 Q. Is that your answer?

19 A. Through law enforcement; correct.

20 Q. Okay. But you would agree with me that
21 by you not reporting it, a -- other faculty that
22 were aware of it by not reporting it to DHS,
23 they're in violation of the statute.

24 A. No.

25 MR. PRIDDY: Object to the form.

1 A. No.

2 BY MR. SMOLEN:

3 Q. You don't think so?

4 A. Correct. No.

5 Q. Why?

6 A. Because we're reporting it through law
7 enforcement, and they were communicating through
8 -- through DHS.

9 Q. What evidence do you have that law
10 enforcement communicated to DHS on Stillwater
11 Public Schools's behalf that Sneed had been
12 sexually assaulted by her teacher?

13 A. I had -- I had no knowledge of Sneed at
14 that time, of that individual. I just knew that
15 there was an individual, and that was reported to
16 law enforcement.

17 Q. So -- so to say that you felt like law
18 enforcement was reporting it to DHS, you're
19 sitting here telling me that you didn't even know
20 who the student was, that you took no steps to
21 find out?

22 A. They -- that was not shared, that
23 information, when police -- when law enforcement
24 talked to me.

25 Q. Did you ask?

1 A. Who the student was?

2 Q. Yeah.

3 A. I don't recall as having -- I didn't have
4 that information.

5 Q. What?

6 A. I didn't have that information.

7 Q. Did you ask the law enforcement officer
8 who was the student who was assaulted?

9 A. No.

10 Q. Did you not care to know?

11 A. I had -- I had -- I had no knowledge of
12 it, of who that was.

13 Q. Did you not care to know who the student
14 was, sir?

15 A. I had a conversation with them about a
16 student. They said it was a student, one of our
17 students. We didn't have who it was. That's the
18 information I had.

19 Q. And you -- you chose not to ask law
20 enforcement who was the student of your school,
21 that you were responsible for, that was sexually
22 assaulted?

23 A. I -- I didn't have that information.

24 Q. But you --

25 A. Yeah, I didn't have that information. I

1 A. Well, there would have just been items
2 that may need to be addressed. On a school -- if
3 it -- if it happened outside of, then there
4 wouldn't be those issues that you would have to --
5 to address.

6 Q. So you're saying if the sexual assault
7 occurred off school grounds, then you didn't have
8 an obligation to ask about the -- learn about the
9 details of it, but if it happened on school
10 grounds, you did?

11 A. Well, there would just be -- there would
12 be -- yeah, if it -- it was an incident that
13 happened, you know, outside, there wouldn't be
14 things that would be related to school.

15 Q. Well, I mean, teachers sexting your
16 students might be of interest; right?

17 A. Yes.

18 Q. Teacher showing up and picking up 15-
19 year-olds and going to have oral sex down the
20 street might be of interest to you; right?

21 A. Yes.

22 Q. The -- the number of girls who had been
23 subjected to that type of conduct by your faculty
24 might be of interest to you, yeah?

25 A. Say -- repeat the question.

1 Q. Finding out the number of victims that it
2 had happened to might be of interest to you, yes?

3 A. If there were other victims, yes, we
4 would want to know.

5 Q. Finding out how the teacher was using his
6 position as a faculty member to gain access to a
7 minor child might be of interest to you; right?

8 A. I had no knowledge if he was using his
9 position.

10 Q. You understand though, if you're not
11 going to conduct an investigation, then you're not
12 going to find out anything. That's the whole
13 point. You understand that you just can't put
14 your head in the sand and say "I don't want to
15 know what happened"; right?

16 A. People can't put their head in the sand;
17 correct.

18 Q. Yeah. You have an obligation, do you
19 not, to create a safe environment for the other
20 students at the school?

21 A. We have an obligation to create a safe
22 environment for the school.

23 Q. Right. And don't you think that ignoring
24 your obligation to find out facts and do any fact-
25 finding puts students at a higher risk?

1 A. I don't know if there's a connection
2 there.

3 Q. Have you ever heard of the term "Turning
4 a blind eye"?

5 A. Yes.

6 Q. What is the difference between refusing
7 to do an investigation and turning a blind eye?

8 A. We didn't turn a blind eye. A blind eye
9 is to not -- it goes away completely. We knew
10 the action with Mr. Morejon ended with his
11 employment.

12 Q. And that's all that mattered to you guys?

13 A. We were processing the employment issue.

14 Q. And then that's all that you were
15 concerned about, right, once that was over?

16 A. Huh? What was your question?

17 Q. That's all you were concerned about is
18 once the employment ended you didn't care about
19 anything else?

20 A. No. I don't think that's an accurate
21 statement.

22 Q. Okay. Then what did you do to show that
23 you cared about the students?

24 A. We didn't have knowledge of the student.

25 Q. But then you chose not to go investigate,

1 **sir. Do you think that that somehow relieves you**
2 **of your responsibility to create a safe**
3 **environment?**

4 A. I don't know, sir, how to answer your
5 question there.

6 Q. **So do you think --**

7 A. I'm not sure what your -- I'm not sure
8 what your question was again.

9 Q. **Do you think that by simply refusing to**
10 **investigate allegations of sexual abuse between**
11 **your faculty member and a student, that by**
12 **purposely not gaining information somehow creates**
13 **a safe environment for your student body?**

14 A. I think we were looking at it from a
15 standpoint of the issue that occurred with Mr.
16 Morejon. We prevented that issue from happening
17 on the school grounds in the future.

18 Q. **What did you guys do to prevent that from**
19 **happening on school grounds in the future?**

20 A. He's no longer employed with the
21 district.

22 Q. **Right. He resigned. He resigned; right?**
23 **You guys didn't even fire him.**

24 A. Right.

25 Q. I'm just trying to understand what you

1 guys did to protect students from people like Mr.
2 Morejon.

3 A. Okay. But you're -- if he hadn't
4 resigned, I could project out what the course was
5 going to be of employment.

6 Q. But he would -- what? That he was going
7 to be terminated?

8 A. That is a terminable offense, yes.

9 Q. I would imagine so.

10 A. Yes.

11 Q. I guess where the disconnect is happening
12 is you're saying the school took affirmative steps
13 to make sure that the students were protected in
14 the future from people like Mr. Morejon.

15 A. Correct, yes.

16 Q. And can you just give me the list of the
17 things that the school district did to ensure
18 that?

19 A. He's no longer employed.

20 Q. Because he personally resigned.

21 A. He resigned before possible -- facing
22 termination.

23 Q. Well, did you tell him that he was facing
24 termination?

25 A. I -- I don't remember what the

1 conversations were when we were going to bring him
2 in, but we didn't bring him in because he didn't
3 -- he -- he resigned before we talked to him.

4 Q. Right. So you guys didn't do anything.

5 A. No. We were scheduled to discipline him.

6 Q. And that never happened.

7 A. He resigned. He moved the meeting -- to
8 my best -- he -- he resigned before the meeting
9 occurred.

10 Q. So short of accepting Mr. Morejon's
11 resignation, can you tell me what the school did
12 to protect students like Ms. Sneed?

13 MR. PRIDDY: Object to the form. You can
14 answer.

15 A. Say -- say -- what -- we were -- say that
16 again.

17 BY MR. SMOLEN:

18 Q. Short of allowing Mr. Morejon to resign
19 his position and receive his full salary, short of
20 doing that, what did the school district do to
21 protect students like Ms. Sneed?

22 A. I'm not sure regarding Ms. Sneed, but as
23 to regard your question about Mr. Morejon, we were
24 looking -- handling it from a personnel matter.
25 He resigned prior to us handling it as a personnel

1 matter, thus preventing him from negatively
2 impacting students in the future.

3 Q. I'm not quite making that link, but we've
4 -- we have kind of gone around in circles on it,
5 so I think it's pretty clear, the disconnect.

6 Beyond allowing Mr. Morejon to resign, can
7 you tell me what the school district did to help
8 remedy a sexually hostile environment for people
9 like Ms. Sneed after Mr. Morejon was charged?

10 MR. PRIDDY: Object to the form.

11 A. I mean -- so what was -- I'm not sure
12 with reference to her, but Mr. Morejon was no
13 longer employed -- no longer employed, so that
14 prevented any action from him, and then other
15 general policies of things that we have in place
16 to protect kids are involved moving forward.

17 BY MR. SMOLEN:

18 Q. So you just left the same policies that
19 were there before in place?

20 A. Policies are continually changing and
21 adjusting. I'm not being -- that's just the way
22 it is. They -- they change every month.

23 Q. I understand, sir.

24 Beyond what you've given me, can you identify
25 anything that the school district did to alleviate